

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Christine Fobb,

Case No. 05-00292

Debtor(s).

Honorable Jacqueline P. Cox

**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT OF FINAL
MORTGAGE CURE AMOUNT**

NOW COMES JP Morgan Chase Bank, National Association (hereinafter referred to as "JP Morgan") by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount Under Paragraph (B)(2)(b), states as follows:

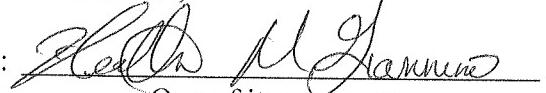
1. On or about January 26, 2005, JP Morgan filed its Proof of Claim as Claim Number 1 for a sum of \$29,046.47 in pre-petition arrears.
2. The Debtor's Amended Chapter 13 Plan filed on January 28, 2005 and confirmed on February 14, 2005 sets-forth a pre-petition arrearage amount owed to JP Morgan of \$29,046.47.
3. JP Morgan's pre-petition arrears of \$29,046.47 were paid by the Chapter 13 Trustee in full.
4. The Debtor's post-petition payments to JP Morgan were to be paid by the Debtor directly "outside" of the plan.
5. On or about April 6, 2009, JP Morgan and Debtor entered into an Agreed Order to cure post-petition default of mortgage payments and to make monthly post-petition payments in a timely manner. A copy of said Agreed Order is attached hereto, made a part hereof and marked as Exhibit "A".

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6. On or about April 29, 2010, JP Morgan filed a Notice Failure to Comply with Agreed Order. Therefore, the Debtor is not current in her post-petition mortgage payments to JP Morgan. A copy of said Notice of Default is attached hereto, made a part hereof and marked as Exhibit "B".

WHEREFORE, JP Morgan Chase Bank, National Association prays that the Court declare that the post-petition payments are not current at this time.

JP MORGAN CHASE BANK, NATIONAL ASSOCIATION,

By: 
One of its attorneys

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